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November 30, 2016

VIA ECF

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *TVB Holdings (USA), Inc., et al., v. HTV International Ltd., et al.*, Civil Action No. 16-CV-1489 (DLI)(PK) in the United States District Court for the Eastern District of New York

Dear Magistrate Judge Kuo:

Plaintiffs and Defendant HTV submit this joint motion to request a telephone conference regarding the above-referenced matter. At present, several discovery related deadlines are approaching, including the December 2nd deadline for HTV to submit a declaration specifying its document discovery process as ordered by the Court in connection with Plaintiffs' motion for discovery sanctions. Since the November 22nd telephone conference with the Court, HTV has refused to fully cooperate with its counsel. Accordingly, counsel for HTV seeks to withdraw from this matter. HTV has indicated that it does not intend to seek new counsel and will not be further defending itself in the action. The parties, therefore, request a telephone conference with the Court to determine how the matter should proceed.

Sincerely,

NI, WANG & MASSAND, PLLC

Neal Massand

cc: John McNamara (via ECF)
Lance Koonce (via ECF)
George Wukoson (via ECF)
Robert Balin (via ECF)